

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

KPM ANALYTICS NORTH AMERICA  
CORPORATION,

*Plaintiff.*

V.

Civil Action No. 21-10572-MRG

BLUE SUN SCIENTIFIC, LLC, THE  
INNOVATIVE TECHNOLOGIES GROUP &  
CO., LTD., ARNOLD EILERT, MICHELLE  
GAJEWSKI, ROBERT GAJEWSKI,  
RACHAEL GLENISTER, GREGORY  
ISRAELSON, IRVIN LUCAS, AND PHILIP  
OSSOWSKI,

*Defendants.*

**PLATINFF’S MOTION FOR LEAVE TO FILE UNDER SEAL THE  
DECLARATION OF KEVIN MOSIER IN SUPPORT OF ITS MOTION FOR A  
PERMANENT INJUNCTION**

Pursuant to Local Rule 7.2, KPM Analytics North America Corporation (“KPM”) hereby requests leave to file under seal the Declaration of Kevin Mosier In Support of Its Motion for a Permanent Injunction. KPM intends to file its Motion for a Permanent Injunction today, June 21, 2023, and will file the Declaration contemporaneously with that Motion or shortly after. There is good cause to grant KPM leave to file the aforementioned Declaration under seal because the deposition transcript attached to said Declaration – the Rule 30(b)(6) deposition of Blue Sun Scientific, LLC “(Blue Sun)” taken on April 27, 2022 – was marked as “Attorney’s Eyes Only” at the behest of the defendants, thus KPM’s Motion For Leave To File Under Seal is brought before this Court to protect information considered competitively sensitive by the defendants, who do not oppose this Motion.

WHEREFORE, KPM respectfully requests that this Court allow KPM to file under seal the Declaration of Kevin Mosier In Support of Its Motion for a Permanent Injunction.

Date: June 21, 2023

Respectfully submitted,

**PLAINTIFF,  
KPM Analytics North America, Corp.**

By its attorneys,

/s/ Kevin R. Mosier

John T. Gutkoski (BBO# 567182)

Kevin R. Mosier (BBO# 703739)

Sunstein LLP

100 High Street

Boston, MA 02110

Tel: (617) 443-9292

[jgutkoski@sunsteinlaw.com](mailto:jgutkoski@sunsteinlaw.com)

[kmosier@sunsteinlaw.com](mailto:kmosier@sunsteinlaw.com)

Scott R. Magee (BBO# 664067)

Paige K. Zacharakis (BBO# 699108)

Morse, Barnes Brown, and Pendleton, P.C.

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

(781) 622-5930

[smagee@morse.law](mailto:smagee@morse.law)

[pzacharakis@morse.law](mailto:pzacharakis@morse.law)

**Local Rule 7.1 Certification**

The undersigned counsel met and conferred with opposing counsel concerning the relief sought in this Motion via email on June 21, 2023. Counsel for Blue Sun indicated that the defendants do not oppose this Motion.

/s/ Kevin R. Mosier

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of June, 2023, a true and exact copy of the foregoing was served on all counsel of record through the Court's ECF system.

/s/ Kevin R. Mosier